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November 3, 2020

Via ECF

The Hon. Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: Jason Gellman v. Port Authority of New York and
New Jersey, et al.
Docket No.: 1:20-cv-2360

Dear Judge Cogan:

As Your Honor is aware, this firm represents the Defendants / Third-Party Plaintiffs, the Port Authority of New York and New Jersey (hereinafter "Port Authority") and Red Hook Container Terminal, LLC (hereinafter, "RHCT") (collectively, "Defendants / Third-Party Plaintiffs") in this matter. We write in furtherance of our October 28, 2020 letter regarding the updated status of our efforts to obtain the outstanding records. Earlier today, we received Dr. Baharestani's records in response to our Subpoena and the Order to Show Cause. We have also received confirmation from Dr. Baharestani's counsel that Dr. Baharestani's production of records is now complete and that there are no additional records from Dr. Baharestani pertaining to plaintiff, Jason Gellman. Our office will be sending Dr. Baharestani's counsel a business records certification for Dr. Baharestani's office's review and execution promptly. Based upon the receipt of Dr. Baharestani's records and Dr. Baharestani's counsel's confirmation as to the completeness of Dr. Baharestani's production, we are prepared to withdraw our Order to Show Cause application as to Dr. Baharestani only.

Thank you for your consideration to this matter.

Respectfully submitted,

s/ *Christopher J. DiCicco*

Daniel G. McDermott

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Jay A. Hamad
Christopher J. DiCicco

cc: **Via ECF**
All counsel of record

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